

January 7, 2006

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
334 12th Street SW
Washington, DC 20554

Dear Chairman Martin:

This letter enters into record my comments on the Commission's public announcement of November 22, 2006, which identified the studies to be conducted as part of the Commission's review of media ownership rules. As an academic researcher whose scholarship in media specifically addresses gender and race in ownership and content, I trust that the following observations and suggestions will be relevant and useful in the Commission's deliberations.

#1: Gender is absent in the slated studies. The list of studies contained in the November 22 announcement omits mention of gender as a specific goal for those conducting the studies. This omission stands in stark contrast to the mention of "minority" concerns in several of the studies. Since the lack of women's ownership was one of the points of reconsideration required by the Prometheus decision, it seems imperative that *all* researchers undertaking commissioned studies attend to *both* race and gender dimensions so the Commission will have adequate data on which to base its ownership rules.

Gender arises as a compelling baseline concern in media ownership, management, and content today. Women's broadcast ownership is pitifully low, shown by my own recent analysis of 2004-2005 Form 323 reports for women and minority ownership, which revealed women own only 3.4% of the broadcast media in the United States today.¹ Turner and Cooper's (2006) similar report, which used a different methodology, found women's ownership of full broadcast TV stations to be severely low, at about 5%.² Moreover, by the Commission's own records, women's ownership has continued to decline since the Telecommunications Act of 1996 was passed. This suggests that those who have been impacted the greatest by deregulation and conglomeration are women.

The current literature on *women's representation* in broadcast content also tells a troubling tale. In television news and public affairs programs, women are central to only 25% of stories in the United States today. Gallagher found that women are particularly underrepresented in U.S. broadcast news stories on economics (12%), and science and health (16%).³ By contrast, they are over-represented

¹ That report, "Questioning Media Access: An Analysis of Women and Minority Ownership Data," by C. M. Byerly, 2006, is available online at <http://www.ssrc.org/programs/media/publications/MediaOwnershipReport.pdf>.

² Please see "Out of the Picture: Minority & Female TV Station Ownership in the United States," S. D. Turner and M. Cooper, available online at http://www.stopbigmedia.com/files/out_of_the_picture.pdf.

³ "Who Makes the News?" (Global Media Monitoring Project 2005 Report), M. Gallagher, p. 121. Available online at www.whomakesthenews.org.

in stories about entertainment and celebrity (40%). Other researchers have found that not only are women missing from serious programming, but they are also prevented from speaking to women's most pressing problems (e.g., persistent poverty, violence, lack of affordable health care) when they are interviewed; instead, they become sources for information on other matters.⁴

Researchers conducting all studies should be required to show how the issues impact women, but several of the studies seem particularly in need of a gender perspective. For example, in Study 1, the researchers might ask: How do women's preferences for news differ from men's? In Studies 7 & 8, researchers might ask: What are the barriers to women's ownership (in addition to those experienced by minorities)? In Study 9, researchers might ask: Has vertical integration served to include or exclude women from ownership and control?

#2: Transparency is lacking in the research process. As others have undoubtedly requested of the Commission, I would like to ask: (1) How the commission came to identify these particular 10 studies, (2) How the various scholars were selected to conduct them, (3) How much public money is allotted to each, (4) What is the timeline for review, (5) what will the peer review process entail, and (6) How will the studies' findings be disseminated?

Answers to these questions are essential if the research process is to have credibility in both academic and governmental arenas, and, more important, if it is to serve the public's needs and interests. As the Commission is aware, there is a robust and growing public debate about media policy; the data arising from these studies will be of interest and use to the leaders and participants in taking part in that debate, and presumably, it will also contribute to the development of just, effective and sound regulations by the Commission.

Please let me know if you have questions or need clarification on any of the preceding comments. Thank you for your attention to my concerns and questions.

Sincerely,

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⁴ "Woman as Sign in Television News," L. F. Rakow and K. Kranich, *Journal of Communication*, 1991, Vol. 41, No. 1, pp. 8-23.